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# COPS Manual

## Universal Hiring Program Grant Owner's Manual

A step-by-step guide  
to assist law enforcement agencies  
in carrying out and reporting on  
their COPS UHP grant

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# **COPS Universal Hiring Program Grant Owner's Manual**

The following manual was created to assist Universal Hiring Program (UHP) grantees with the administrative and financial matters associated with the grant.

For more information about your UHP grant, contact your COPS grant advisor. If you do not know who your grant advisor is, or do not know the telephone number of your grant advisor, contact the U.S. Department of Justice Response Center at 1-800-421-6770.



**U.S. Department of Justice  
Office of Community Oriented Policing Services  
1100 Vermont Avenue, NW  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code.)**

Internet web site: <http://www.usdoj.gov/cops/>

**April 1998**

# COPS Universal Hiring Program Grant Owner's Manual

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## GETTING STARTED

Congratulations on receiving a grant from the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). You have received a grant under the COPS Universal Hiring Program, which provides funding directly to local, state and tribal jurisdictions for salaries and benefits of officers engaged in community policing. This COPS Universal Hiring Program Grant Owner's Manual will assist you with the administrative and financial matters associated with your grant. It was developed by the COPS Office in conjunction with the Office of the Comptroller (Office of Justice Programs) to ensure that COPS grantees clearly understand and meet the requirements of their grants. Please do not hesitate to call the COPS Office at 1-800-421-6770 if you need assistance with the implementation of your grant.

Thank you for providing us with the opportunity to work in partnership with your community.

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For assistance, call the COPS Office  
at 1-800-421-6770.

## GETTING STARTED

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## GLOSSARY OF TERMS

### **Allowable costs**

The Universal Hiring Program provides for the salaries and approved fringe benefits for three years for sworn entry-level, lateral-transfer or rehired officers. Upon review of your submitted budget, any nonallowable costs were removed and your total budget amount was revised accordingly. A copy of the budget clearance memorandum from the Office of the Comptroller (Office of Justice Programs) identifying these revisions is included in your package. Only entry-level salary and fringe benefit costs are allowable costs under the grant. Overtime, training (other than salary and benefits paid during training), weapons, communication equipment, uniforms, vehicles and indirect costs are not allowable costs.

### **Authorized official**

The authorized official is the individual in your organization who has final responsibility for all programmatic and financial decisions regarding this grant award.

### **Career law enforcement officer**

A career law enforcement officer is an officer hired on a permanent basis who is authorized by law or by a state or local public agency to engage in or supervise the prevention, detection or investigation of violations of criminal law.

### **Catalog of Federal Domestic Assistance (CFDA)**

The CFDA is a governmentwide publication orchestrated by the General Services Administration. It is published annually. The CFDA contains a description and index of all forms of Federal assistance available from the Federal government. Each grant-making agency is responsible for submitting descriptions of their programs. Each program is assigned a “CFDA number” by the editors of the catalog. The CFDA number is used by auditors in tracking grant revenues under the Single Audit Act, and used by State Single Points of Contact in conducting the required intergovernmental reviews under Executive Order 12372 in those states that participate in that program. The COPS CFDA number is 16.710.

### **Cognizant Federal Agency**

Your Cognizant Federal Agency is generally the Federal agency that provides you with the most Federal money. Your Cognizant Federal Agency already may have been assigned to you by the Office of Management and Budget. If this is the first Federal grant that your organization has received, the U.S. Department of Justice (DOJ) is your Cognizant Federal Agency. Your audit reports should be sent to the Regional Audit Offices of the U.S. Department of Justice. A list of the Audit Offices is provided in Appendix C.



## **COPS Office**

The Office of Community Oriented Policing Services (COPS) is your “grantor agency” for your Universal Hiring grant. The COPS Office is responsible for administering your grant for the entire grant period. You can reach the COPS Office at 1-800-421-6770.

## **Grant number**

This number is in the following format: 95-CF-WX-0000, 95-CC-WX-0000, 95-UL-WX-0000 or 95-UM-WX-0000 for grants awarded in FY 1995 and 96-UL-WX-0000 or 96-UM-WX-0000 for grants awarded in FY 1996. It can be found in the upper, left-hand corner of your grant Award Page. It is assigned by the Office of the Comptroller and should be used when corresponding with that office. This will aid the Comptroller’s staff in determining to which grant you are referring.

## **Matching funds**

Under the COPS Universal Hiring Program, unless a waiver has been granted because of severe fiscal distress, the COPS Office provides up to 75 percent of the entry-level salaries and fringe benefits for a new or rehired law enforcement officer over three years. The maximum that the COPS Office can pay per officer for that 3-year period is \$75,000. COPS Universal Hiring Program grantees are responsible for at least 25 percent of the total cost of salaries and fringe benefits. The match must be a cash match. See “Meeting the Local Match,” section III of this manual, for more information.

## **Obligation of funds**

Federal funds are considered “obligated” when the grant award document is signed by the director of the COPS Office or his designated official. Funds are reserved against the grant until all the grant monies are spent or refunded to the Federal government. Local funds are considered “obligated” when the salaries and benefits have been paid or will be paid for work performed by the officer(s) during a previous pay period.

## **Office of the Comptroller/Financial Analyst**

The Office of the Comptroller (Office of Justice Programs) handles your financial and budgetary needs related to the COPS grant. You have a financial analyst assigned to your state from that office who is available to answer any questions that you may have concerning the financial aspects of your COPS Universal Hiring Program grant. To identify your financial analyst, refer to the budget clearance memorandum enclosed in your award package.

## **OJP EIN number**

This number is your agency’s Federal identification number as assigned to you by the IRS. In some cases, the EIN has been previously assigned to another agency within your jurisdiction. In that instance, a new vendor number will be assigned to you by the Office of the Comptroller. The new assigned vendor number is to be used for administrative purposes only and should not be used for IRS purposes.

### **ORI number**

(Originating Agency Identifier) This number is assigned by the FBI, and it is your agency's identifier. The first two letters are your state abbreviation, the next three numbers are your county's code and the final two numbers identify your jurisdiction within your county. It can be found on your grant award document. When you contact the COPS Office with a question, you can use the ORI number or your grant number, and we will be able to assist you.

### **The Public Safety Partnership and Community Policing Act of 1994**

The COPS Office is charged with fulfilling the mandates of this law. The purposes of the law are to:

- Substantially increase the number of law enforcement officers interacting with members of the community;
- Provide additional and more effective training to law enforcement officers to enhance their problem-solving, service and other skills needed in interacting with members of the community;
- Encourage the development and implementation of innovative programs to permit members of the community to assist law enforcement agencies in the prevention of crime; and
- Encourage the development of new technologies to assist law enforcement agencies in reorienting the emphasis of their activities from reacting to crime to preventing crime.

### **Supplanting**

For the purpose of your COPS grant, supplanting means replacing state or local funds which otherwise would have been spent on law enforcement purposes with Federal COPS funds. You are prohibited from supplanting throughout the 3-year grant period, which means that you may not use COPS funds to pay for any sworn officers (full-time, part-time, reserve or other paid officer positions) who otherwise would have been employed with state or local funds in the absence of the COPS program. COPS funds must instead be used to supplement your law enforcement budget. As a general matter, in assessing the presence of supplanting, throughout the grant period we will expect you to hire new officers at a level consistent with recent historical practice and to take positive and timely steps to fill all vacancies in your sworn personnel resulting from attrition. For further information, please review grant condition #3 and/or contact the COPS Office Legal Division at (202) 514-3750.

### **Supplemental Grant Award**

A Supplemental Grant Award is a grant award which adds monies to an existing grant under the same grant award number. For example, if your jurisdiction received a COPS FAST grant award with a 95-CF-WX-0001 grant number and you were awarded additional officers under the COPS Universal Hiring Program, the COPS Office will add the funds for your Universal Hiring officers to your COPS FAST grant under the 95-CF-WX-0001 grant number. Supplemental funds may be added to COPS AHEAD, COPS FAST and UHP grants. The benefit of this is that your jurisdiction will only fill out one set of Progress Reports and Financial Status Reports for both your original grant award and your Universal Hiring Program award.



**I**n order to officially begin your grant, you will need to review the Award Page and Conditions, sign the new Award, Modified Award or Supplemental Award Page, and return it to:

**COPS Universal Hiring Program  
Office of Community Oriented Policing Services (COPS)  
1100 Vermont Ave., NW  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code.)**

You will be able to draw down grant funds after:

1. The COPS Office approves your budget.
2. You sign your Award Page or Modified Award Page and return it to the COPS Office.
3. After steps one and two are completed, you may access your grant funds through the PAPRS or LOCES systems.

See Section II, “Accessing Grant Funds,” for more information.

## **AWARD PAGE**

The Award Page is the one-page, double-sided document indicating your official grant funding amount, the award number, the award date and the grant time period.

The Award Page also contains preprinted information of your law enforcement and government officials’ names and addresses. If this information is incorrect or has changed, please correct it on the correction page attached to the Award Page.

Your grant number is in this format: 95-CF-WX-0000, 95-CC-WX-0000, 95-UL-WX-0000 or 95-UM-WX-0000 for grants awarded in FY 1995; 96-UL-WX-0000 or 96-UM-WX-0000 for grants awarded in FY 1996; 97-UL-WX-0000 or 97-UM-WX-0000 for grants awarded in FY 1997; and 98-UL-WX-000 and 98-UM-WX-0000 for grants awarded in FY 1998. It is used for financial purposes and should be referred to when dealing with the Office of the Comptroller.

Your ORI number begins with your state abbreviation followed by numbers and/or letters. This number is assigned by the Federal Bureau of Investigation for use in tracking information for the Uniform Crime Report. The COPS Office tracks grant information based upon this ORI number.

If you have any questions regarding your grant, please refer to your grant award number or your agency's ORI number, and we will do our best to assist you.

### **What is a Modified Award?**

In a small number of cases, a Modified Award Page may be included in this mailing. The final grant amount on this document may differ from the estimated amount on your original Award Page because the final grant amount is based upon your approved budget. If you are receiving a Modified Award, take careful note of the change between your estimated award amount on the original document and the actual amount on the Modified Award. If you have any questions about the modification, refer to your budget clearance memorandum. If you still have questions, please contact your financial analyst. After you review and understand this document, please sign, make a copy for your records and mail the original back to the COPS Office with your payment selection sheet.

### **What is a Supplemental Award?**

A Supplemental Grant Award is an addition to your existing COPS FAST, AHEAD or UHP award. We use the same grant award number as was given to you in the initial award and simply add money, officers and time to the terms of the grant. For example, Hessville Police Department received a COPS FAST grant award in 1995 of \$75,000 for one officer. Their FAST grant award number is 95-CF-WX-0001. Their FAST award start date was April 1, 1995, and their end date is March 31, 1998.

Hessville then filled out a one-page Universal Hiring Program application in September 1995. This application requested new officers for 1996. In May of 1996, the COPS Office sent a notification letter to Hessville that it would be receiving another officer through the Universal Hiring Program. In order to streamline the administrative process for Hessville and the COPS Office, the COPS Office simply added the money to the original award, added one officer, and added a year to the end date of the original FAST award. Now, under the supplemental Universal Hiring Program, Hessville has a total of two officers for \$150,000. Their grant start date remains April 1, 1995, but now, their grant end date is March 31, 1999.

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Your award page gives your award amount, award number, award date and grant period. You must sign and return this document to accept your COPS UHP award.

## **What are the benefits of the Supplemental Award rather than a new award?**

Every time Hessville gets a new grant award, that award is accompanied by the administrative requirements of quarterly Financial Status Reports and annual Progress Reports. When all of the officers are together on the same grant award, then you can report on them all at once, rather than reporting multiple times.

## **When is my Supplemental Award start date?**

Refer to your UHP Supplemental Award document for this date. Your Supplemental Award may only provide funding for those UHP officers who were hired after this date.

## **As a recipient of a Supplemental Grant Award, should I adhere to the grant conditions under my original COPS FAST/AHEAD award or my COPS Universal Hiring Program award?**

We have written the grant conditions for your UHP award so that they complement those of your FAST or AHEAD award. Grant condition number two (2) for all supplemental awards clearly states:

*Your agency remains subject to the same terms and conditions as were set forth in the original FAST or AHEAD award.*

## **GRANT CONDITIONS**

The grant conditions are the terms listed on the back of your Award Page. By accepting this grant, you are entering into an agreement with the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). As part of that agreement, you agree to these 11 grant conditions (and possibly additional conditions specific to your agency). The section that follows describes in detail each of the award conditions, their rationale and their implications. It also addresses many commonly asked questions.

In special cases, a grant condition that your agency may receive will prevent draw down or access to your funds until it is satisfied. For example, you will not be able to draw down funds until your budget receives final clearance. If you receive an award with a budget special condition, your budget has not received final clearance. In those cases, you will receive notification in writing when your budget has been cleared. It should be clear to you when you review the award page and any corresponding grant conditions which, if any, would prevent draw downs until satisfied. However, if you have any questions about these conditions, please call your grant advisor.

## Reasons for grant conditions

The requirements of your COPS Universal Hiring grant are established within:

- The Public Safety Partnership and Community Policing Act of 1994 under which the COPS Office was established; and
- Applicable rules, regulations and policies issued by the Department of Justice, Office of Management and Budget (OMB), the General Accounting Office (GAO) and the United States Treasury.

You may request copies of any source reference document from:

**Office of Administration  
Publication Unit, Room G 236  
New Executive Office Building  
Washington, DC 20503**

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There are 11 grant conditions that you agree to when you accept this UHP grant.

or COPS documents from either the COPS Office or the Office of the Comptroller.

## Review of grant conditions

### 1. ALLOWABLE COSTS

*The funding under this project is for the payment of SALARIES AND APPROVED FRINGE BENEFITS for three years for sworn entry-level career law enforcement officers, lateral transfers or rehired officers. Grant funds may not be applied to portions of salaries above entry level. Rather, such amounts must be provided for by the grant recipient. Overtime, training, weapons, communication equipment and vehicles cannot be paid for with this funding.*

**Why This Condition:** The COPS Universal Hiring Program is a program that can fund only entry-level salaries and benefits for the hiring or rehiring of career law enforcement officers.

**What You Should Do:** Salaries covered by COPS grants must be reasonable for the services rendered and paid to an officer appointed under the laws or rules governing hiring by your agency. Salary payments must be based on

payroll records supported by time and attendance records or the equivalent. The types of records you must keep to document that you are following this grant condition are described in Section IV of this manual.

Fringe benefits may be paid if they are part of a reasonable compensation package offered to your employees and if they fall within the categories authorized by the COPS Office which include FICA, Social Security, health insurance, life insurance, vacation, sick leave, retirement, worker's compensation and unemployment insurance. Equipment, overtime, training, uniforms, weapons, and such costs other than salaries and benefits are not allowed. However, if you train your officers prior to swearing them in, grant funds may be applied to salaries and benefits paid to the new officers during training. As long as you spend the funds on salary and benefits that you documented in your budget summary and that were approved by your financial analyst, this condition will be satisfied.

## **2. FISCAL YEAR AND COGNIZANT FEDERAL AGENCY**

*Prior to withdrawal of funds under this award, the recipient must provide the Control Desk, Office of the Comptroller, with the recipient organization's fiscal year and the name of the recipient organization's Cognizant Federal Agency.*

**Why This Condition:** In order to ensure that your agency is in compliance with Federal audit requirements and OMB regulations, the Office of the Comptroller and the Cognizant Federal Agencies must coordinate tracking of all Federal funds awarded under grants. To accomplish this, we need your cooperation in gathering the information.

**What You Should Do:** This information was requested in the application form you submitted for COPS Universal Hiring Program. In most cases this condition has been satisfied. However, if you did not provide this information, your Cognizant Federal Agency is the Federal department or agency that provides you with the most Federal money. It may have been assigned to your jurisdiction previously. If this is your first Federal grant, your Cognizant Federal Agency is the U.S. Department of Justice. Please contact your grant advisor if you have any questions about the identity of your Cognizant Federal Agency.

## **3. SUPPLEMENTING, NOT SUPPLANTING**

*COPS Universal Hiring Program grant funds must be used to hire one or more new, additional career law enforcement officers, beyond the number of officers that would be hired or employed by the grantee in the absence of the grant. Generally speaking, in the case of a grantee starting a new law enforcement agency, the grantee must continue the level of service, if any, previously provided on a contract and utilize the grant funds to expand the level of service. Unless authorized in writing by the COPS Office, grant funds may not be applied to the salary or benefits of an officer hired by a grantee prior to your Universal Hiring Grant award date.*



**Why This Condition:** The Public Safety Partnership and Community Policing Act of 1994 specifically states that Federal funds under the COPS programs may not be used to supplant local or state funds which would be spent on law enforcement purposes in the absence of the COPS grant.

**What You Should Do:** COPS Universal Hiring funds may not replace resources the grantee would have used or had committed to use for law enforcement purposes without the grant. COPS funds are expected to increase the grantee's force level above the number of funded (filled and vacant) sworn positions existing as of May 1, 1995, plus any additional funds added to the law enforcement budget for sworn officers since that date. The Public Safety Partnership and Community Policing Act of 1994 specifically states that Federal funds under the COPS programs are not used to supplant existing local or state funds. **You may, however, transfer a veteran officer to the community policing position and use COPS funds to hire a new officer to replace the redeployed veteran.**

To meet this grant condition, you will need to ensure that:

- Each officer that you hire under COPS Universal Hiring is newly hired (after your Universal Hiring award date or Supplemental Award start date, as may be applicable), unless an exception is authorized in writing by the COPS Office Legal Division. *Please contact the COPS Office Legal Division at (202) 514-3750 for further information.*
- The officer(s) that you are hiring brings your force to a number over and above your previously funded sworn force.
- During the life of your grant, you must continue to hire as many new, locally-funded officers as you would have if you had not received your grant. (You may not cancel or postpone spending money in your budget that is committed to hiring other new officers.)
- You must take positive and timely steps to fill any vacancies that were created on or after your grant award date by retirement, resignation or other reasons with new officers **other than your COPS Universal Hiring officer**. Again, any exception must be authorized in writing by the COPS Office Legal Division.
- You do not reduce your locally funded baseline of sworn personnel as a result of receiving the COPS funding.

A "career law enforcement officer" is an officer hired on a permanent basis who is authorized by law or by a state or local public agency to engage in or supervise the prevention, detection or investigation of violations of criminal law.

#### **4. RETENTION**

***Your agency is expected to develop a plan to retain the positions funded by the COPS Universal Hiring Program grant funds at the conclusion of the grant.***

**Why This Condition:** The Public Safety Partnership and Community Policing Act of 1994 envisions that positions for officers should be maintained by localities beyond the Federal funding period. The local match and the provision of a decreasing Federal share were established to enable communities to adequately plan for paying the salaries and benefits of the new officers without burdening them with the full cost of hiring a new officer. It is up to your agency to determine how the Federal share decreases from year to year. Please refer to your application budget information sheet that you provided to the COPS Office to review your Federal/ local share plan.

**What You Should Do:** Your retention plan, which must be submitted to the COPS Office for review, should **focus on maintaining the position beyond the life of the grant, not continuing to employ the specific officer.** If, for any reason, the officer originally filling the position funded by the COPS Universal Hiring Program grant leaves your department, it is anticipated that you will fill the position with a new officer.

## 5. EQUAL EMPLOYMENT OPPORTUNITY PLAN (EEOP)

*For grants of \$500,000 or more, the grantee acknowledges that failure to submit an acceptable Equal Employment Opportunity Plan (if the grantee is required to submit one under 28 CFR 42.302) that is approved by the Office of Justice Programs, Office for Civil Rights, is a violation of its Assurances and Certifications and may result in the suspension of the draw down of funds. For grants under \$500,000, the grantee must submit a completed EEOP Certification form and return it, within 120 days of the grant award, to:*

**Office of Civil Rights  
Office of Justice Programs  
810 7th Street, NW  
Washington, DC 20531**

**Why This Condition:** The purpose of an Equal Employment Opportunity Plan (EEOP) is to ensure full and equal participation of men and women regardless of race or national origin in the work force of the recipient agency. EEOPs do not impose quotas or hiring requirements. The U.S. Department of Justice (DOJ) regulations regarding the requirements for an EEOP for Federal grant recipients and the required contents of the document are fully explained in 28 C.F.R. 42.301 et seq.

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Your agency must develop a written plan to retain the UHP positions after Federal funding has ended.

**What You Should Do:** U.S. DOJ regulations require you to prepare and maintain an EEOP if your organization:

- (i) has 50 or more employees; **and**
- (ii) received a total of \$25,000 or more in grants or subgrants; **and**
- (iii) has 3 percent or more minorities in its service population. Even if there is less than 3 percent of minorities in the service population, the DOJ regulations require that the EEOP be written to focus on women.

Grantees that meet criteria (i) **and** (iii) above and received \$500,000 or more or a total of \$1 million in grant funds during an 18-month period, are **required** to submit an EEOP to:

**Office of Civil Rights  
Office of Justice Programs  
810 7th Street, NW  
Washington, DC 20531**

If you meet the above criteria but your grant is for less than \$500,000 and you have received less than \$1 million in grant funds during an 18-month period, you need to complete and return the one-page COPS EEOP Certification form within 120 days of your grant award to advise us whether you have an EEOP in effect or whether you are exempt from this requirement. If you need help preparing an EEOP, please consult the [Seven Step Guide to Preparing an EEOP](#) included in this award package.

## **6. REPORTS**

*In order to assist the COPS Office in the monitoring of the award, your agency will be responsible for submitting annual Progress Reports and quarterly Financial Status Reports. As those reports become due, your grant advisor and financial analyst will provide you with the forms and information necessary for compliance.*

**Why This Condition:** The Public Safety Partnership and Community Policing Act of 1994 and other Federal regulations and policies require that financial assistance provided by the Federal government be monitored carefully to ensure the proper use of Federal funds. In addition, the COPS Office seeks to document, on a continuing basis, the progress of our programs and our grantees.

**What You Should Do:** This grant condition is to make you aware of your responsibilities in assisting us with reporting requirements. These reports are discussed extensively in Section VI of this manual. To meet this condition, you will be requested to fill out one Program Progress Report per year and four Financial Status Reports per year.

## 7. EXTENSIONS

*Requests for extensions, without additional funding, of the grant award period should be submitted in writing to your grant advisor no sooner than two years after the official start date of the award.*

**Why This Condition:** Under Federal regulations, requests to extend the grant period require prior approval. Without an approved extension, your funding will be automatically stopped at the end of the grant period.

**What You Should Do:** In an effort to reduce the number of extensions during the grant period, the COPS Office asks that you delay any request for an extension until you are well into your grant and are able to determine accurately when you expect the grant to be over. When the COPS Office receives and approves your extension request, we will ensure that you have continued access to your grant monies.

## 8. CONTRACTS WITH OTHER JURISDICTIONS

*Officers funded under this grant may only be involved in activities or perform services that exclusively benefit your agency and the population that it serves. If your agency contracts for its officers with another law enforcement agency, your agency is responsible for ensuring that this arrangement is in compliance with the conditions of your grant.*

**Why This Condition:** Occasionally, small towns enter into contracts with county or state law enforcement agencies. When a small town decides to use its COPS Universal Hiring Program grant to contract for the services of an officer from a local police department or sheriff's office, the small town must ensure that the activities of the officer are in accordance with the terms and conditions of its Universal Hiring Program grant.

**What You Should Do:** Any officer that has been funded under the COPS Universal Hiring Program cannot be hired out by your agency to other agencies unless it will directly benefit the population that you serve. If your department will contract with another department for the officer funded under this grant, you must ensure that the contract is in accordance with the terms and conditions of your Universal Hiring Program grant.

## 9. EVALUATION

*The COPS Office may conduct national evaluations of the community policing activities of its grantees and other COPS-funded initiatives. The grantee agrees to cooperate with the evaluators.*

**Why This Condition:** The Public Safety Partnership and Community Policing Act of 1994 states that evaluations of the program may be carried out or commissioned by the Attorney General for the furtherance of the purposes

of the Act. The COPS Office plans to conduct evaluations to determine what programs are working, how programs may be improved and why certain programs are working better than others.

Specifically, the COPS Office may assess the way in which you implement your community policing program. In some jurisdictions, COPS staff or evaluators may study the effectiveness of funded programs, projects and activities. Evaluators may collect information about the programs' effect on crime, victims of crime and the quality of life in communities. In addition, they may ask questions about how residents feel about community policing and how police feel about their work. This information will be useful to other communities and police agencies across the country.

**What You Should Do:** When evaluations are undertaken, you may be contacted in writing with specific requests for information. In general, evaluators may need to speak with individuals in your department, observe activities of your department, and obtain written reports about and from your department. You will be asked to facilitate any site visits and information-gathering activities. In addition, you will be asked to provide accurate and timely information about your grant activities.

## **10. GRANT OWNER'S MANUAL**

*The grantee agrees to abide by the terms, conditions and regulations as found in the COPS Universal Hiring Program Grant Owner's Manual.*

**Why This Condition:** This manual has been tailored to inform you of the policies, procedures and regulations that apply to your grant. You will be responsible for the information and rules contained in this manual. More detailed guidance can be requested through your grant advisor.

**What You Should Do:** Please read the entire COPS Universal Hiring Program Grant Owner's Manual carefully prior to signing the grant Award Page. If you have any questions, please contact your grant advisor. When you sign the Award Page, you should ensure that the proper reporting and financial systems are in place to satisfy the requirements.

## **11. EMPLOYMENT ELIGIBILITY**

The grantee agrees to complete and keep on file, as appropriate, an Immigration and Naturalization Service Employment Eligibility Verification Form (I-9). This form is to be used by recipients of Federal funds to verify that persons are eligible to work in the United States.

## ASSURANCES & CERTIFICATIONS

In addition to the grant conditions, your agency remains bound by the signed Assurances and Certifications that it provided to the COPS Office upon application to the COPS FAST, AHEAD or Universal Hiring Program.

Although the U.S. Department of Justice has made every effort to simplify the process for applying for and receiving grants, provisions of Federal law require us to seek your certification regarding certain matters. Most of these Assurances apply to all grants provided by the Federal government. When you have completed your original application, the Assurances that you agreed to by signing the application were included in the application kit. Another copy of the Assurances is contained in Appendix B of this manual. If you have any questions about them, please contact your grant advisor.

## ACCEPTING THE GRANT AWARD

After you have reviewed the conditions of the award and your agency agrees with those conditions, you are ready to accept the award. At the bottom of the Award Page are three signature lines. Joseph E. Brann, the Director of the COPS Office, has signed the Award Page indicating approval of your grant, an obligation of Federal funds to your organization and our commitment to the award. To officially begin the grant and to be able to draw down your funds, **your law enforcement executive and government executive** must sign the Award Page and return the original copy to:

**COPS Universal Hiring Program  
Office of Community Oriented Policing Services (COPS)  
1100 Vermont Ave., NW  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code.)**

*Faxed awards cannot be accepted.*

### Who should sign the award for my agency?

The law enforcement executive and government executive who have final responsibility for all programmatic and financial decisions regarding this grant award must sign the Award Page. The police chief or sheriff is the law enforcement executive. The mayor, city manager or county executive is the government executive. If you have any questions as to who should sign the award, please contact your city's or county's legal advisor.

## **When do the grant materials need to be returned?**

Please return the signed Award Page within 45 days of your receipt of it. No funds may be released until we have received your signed Award Page, your budget has received final clearance and any other relevant grant conditions particular to your agency have been satisfied.

If you require an extension for accepting the award beyond the 45-day time frame for any reason, please request it in writing from your grant advisor.

## **What are the specific rules regarding termination of grant funding?**

The COPS Office has the right to sanction or to terminate your project only when there is reason to believe through periodic monitoring or review that you:

- Are not substantially complying with the requirements of the Act, the guidelines or with other provisions of Federal law;
- Are failing to make satisfactory progress toward the goals or strategies in your application and information, as reflected by performance and status reports;
- Do not adhere to grant agreement requirements or conditions;
- Propose substantial plan changes to the extent that, if originally submitted, would have resulted in the application not being selected for funding;
- Do not submit reports (in a timely manner);
- File false certification in connection with an application, periodic report or other document submitted to the COPS Office or to the Office of the Comptroller; and/or
- Provide other good cause for termination. Good cause will be determined by the COPS Office.

In these instances, we may:

- Temporarily withhold payments pending correction of the situation by you;
- Disallow all or part of the cost of the activity or action not in compliance;
- Wholly or partly suspend or terminate the current award for your grant;
- Require that some or all of the grant amounts be remitted to the U.S. Department of Justice;
- Condition a future grant or elect not to provide future grant funds to you until appropriate actions are taken to ensure compliance;
- Withhold further awards for the program;
- Recommend civil or criminal enforcement by other agencies; and/or
- Take other remedies that may be legally available.

In the event that sanctions are imposed or a grant is terminated, you will be notified in writing of our decision and the reason(s) for that decision. You also will receive reasonable time to either discontinue operations or seek support from other sources.

### **How are changes to the grant made?**

You must seek prior approval if you plan to make grant changes relating to any of the following issues:

- Changes in number of officers that will be hired under your COPS grant.
- Extensions.
- Salary and benefit changes.
- Major programmatic changes.
- Changes in plans to retain.

In order to make one of these changes, you will need to submit your plans in writing to the COPS Office for prior approval. Extensions will allow you to lengthen your grant period to ensure that you are able to support the position for a full three years if you have any delays in hiring or periods when the position is vacant. Please document your reasons for the proposed changes and add any other information that will assist us in reviewing the changes.

### **Other questions about accepting the grant**

If for any reason you have questions about accepting this grant, please contact your grant advisor by calling 1-800-421-6770. If you have decided not to accept this grant, please send us a letter advising us of your decision.

However, prior to deciding not to accept your COPS Universal Hiring Program grant, please contact your grant advisor to discuss other options. If, for example, between the time you submitted the application and received an award, the person you intended to hire has decided not to accept the position, you may request an extension of the grant period.



**T**his section provides information about how you receive funds and gives answers to payment-related questions. If you are a new grantee to the COPS Office, you should receive a packet of financial-related documents shortly after receipt of your award package. This packet will contain all of the information that you need to set up your payment method and a Financial Guide to assist you with financial management and grant administration.

## **PAYMENT METHODS**

There are two methods of payment that you can use to access your grant funds: PAPRS and LOCES. In emergency situations, you may use a Revised H-3 (Request for Payment). Your use of the Revised H-3 must be cleared with an Office of the Comptroller Accountant prior to submission.

The following explanation of payment methods will assist you in determining which payment method you would like to use in accessing your COPS grant funds.

### **A. PAPRS - Phone Activated Paperless Request System**

PAPRS replaces the paper form H-3 (Request for Payment) requests by enabling grantees to use their touch-tone telephone to request funds. Approved payment requests will be automatically scheduled for payment by the U.S. Treasury. The system also provides online information to grantees about the status of their requests.

If you do not have a touch-tone phone, please contact the Accounting Division helpline at (202) 307-5909.

#### **How do we set up a PAPRS account?**

If you are a new grantee to the COPS Office, you should receive a packet of financial-related documents shortly after receipt of your award package. This packet will contain all of the information that you need to set up your payment method. You will receive a PAPRS user's manual under a separate cover from the Office of the Comptroller, Accounting Division. Once you receive your OJP Vendor Number (which may or may not be the same as your taxpayer identification number) and PIN number, you can follow the directions in the user's manual to access your funds.

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LOCES allows you to electronically request and receive grant funds.

## **B. LOCES - Letter of Credit Electronic Certification System**

LOCES is a modem communication system that allows recipients of COPS funds to electronically request payment from any of their grant funds and receive direct deposit to their bank accounts within 48 hours. You will need a computer with a dedicated modem.

1. To make requests for payments through LOCES, you must have a personal computer operating DOS 3.1 or higher. We recommend a 28.8 baud modem.
2. Complete and return the LOCES Automation Survey form. Upon receipt, your LOCES software will be customized for your use and forwarded to you.
3. Complete an ACH Vendor /Miscellaneous Payment (SF 3881) enrollment form and forward to your bank.

A complete LOCES form and manual package may be requested by contacting the Accounting Division helpline at (202) 307-5909. In addition, the Accounting Division can provide technical assistance on using the LOCES system.

### **What are the benefits of LOCES?**

The LOCES method is a completely computerized method of payment. It also allows you to file your quarterly Financial Status Reports (SF-269) electronically.

## **SETTING UP YOUR ACCOUNT**

### **How do I fill out the payment enrollment forms?**

In the packet of financial-related documents you received is an Automated Clearing House (ACH) Vendor /Miscellaneous Payment (SF 3881) enrollment form. The ACH Vendor /Miscellaneous Payment (SF 3881) enrollment form

needs to be filled out regardless of the payment method. You must return this form to the Office of the Comptroller, U.S. Department of Justice, 1100 Vermont Avenue, NW, 2nd Floor, Washington, DC 20530, prior to trying to access your funds. The “Agency Information” section has been filled out by our Accounting Division. Your agency needs to fill out the “Payee/Company Information” section following the directions on the back of the form. You also need to provide the grant number (printed on the award page) on this form. Then you must have your financial institution complete the “Financial Institution Information” section and have the appropriate financial official sign the form.

If you are already a COPS Office grantee, you should already have selected one of the two payment methods and filled out an ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form. If you have any questions, please call the Accounting Division helpline at (202) 307-5909.

### **Do I need a Financial Status Report to open my account?**

As part of Federal auditing requirements, your agency has to complete a Financial Status Report (Standard Form 269) quarterly. Payment requests will be denied if the current 269 is over due. Please make blank copies of the form (both sides) provided in your award packet and retain them for future use. This form is a report of your expenditures (the amount of money that your agency has expended) for the grant. The Financial Status Report is due 45 days following the end of a calendar quarter (calendar quarters end March 31, June 30, September 30 and December 31). Even when you have not expended any funds during a quarter, the Financial Status Report should be submitted with zeros in the appropriate spaces. When setting up your account, check to see when the last quarter ended and fill out a Financial Status Report to reflect the amount of your agency’s expenditures for the grant for that quarter and submit the form along with the ACH Vendor form. For the rest of the year, please submit Financial Status Reports **no later than** May 15, August 15, November 15 and February 15.

Completing the Financial Status Report does not mean that you will be reimbursed for the amount you show as being expended. You must still request payment through PAPRS or LOCES (see the section on payment methods).

For more information, see Section VI of this manual on reports.

## **ADDITIONAL PAYMENT QUESTIONS**

### **Can we receive advances?**

Yes. If you receive funds through electronic transfer, the period allowed is ten (10) days in advance. If you receive funds by Treasury check, the period allowed is 28 days in advance.

In general, the concept of “minimum cash on hand” applies to COPS grants. The minimum-cash-on-hand concept requires that you request funds based upon immediate cash disbursement needs. You should time your request for payment to ensure that Federal cash on hand is the minimum that you need to make your immediate salary and fringe benefit payments. There should be no excess Federal grant funds on hand, except for approved advances discussed above.

The Federal Government has four basic rules regarding advances. Advances can be terminated if the grantee:

- Is unwilling or unable to attain project goals;
- Maintains excess cash on hand;
- Does not adhere to the terms and conditions of the grant; or
- Fails to submit reliable and/or timely reports.

### **How often do we request reimbursement of costs?**

There are no definitive guidelines on how often you should request reimbursements. Only reimbursements for actual salaries and benefits of COPS Universal Hiring Program officer(s) can be made.

### **Can we earn interest on our grant funds?**

You should minimize the time between your draw down of grant funds and your payment of grant costs. You need to account for interest earned on advance of Federal funds as follows:

- You may keep interest earned on all advances of Federal grant funds up to \$250 per fiscal year; and
- Annually pay back interest earned (over and above \$250 per fiscal year) on advances of Federal grant funds to the U.S. Department of Health and Human Services, Payment Management Systems, Rockville, MD 20852.

**T**he COPS Universal Hiring Program provides up to 75 percent of the entry-level salary and fringe benefits for a new or rehired law enforcement officer over three years up to \$75,000. The maximum that the COPS Office can pay per officer for that 3-year period is \$75,000. Grantees are responsible for at least 25 percent of the total cost of salaries and fringe benefits unless the requirement of a local match has been waived in whole or in part. The match must be a cash match.

## MATCHING FUNDS

### What are some sources of matching funds?

Sources for match requirements may include:

- Program income funds from asset forfeitures.
- Funds from state or local government that are committed to matching funds for your program.
- Funds from Federal programs which specifically authorize use as matching funds, such as the Housing and Community Development Act of 1974 or the Equitable Sharing Program.
- Funds contributed by private sources.

### When and how must the match be made?

Matching contributions may be applied at any time during the life of your grant provided that the full matching share is obligated by the end of the grant period. **In addition, as a percentage of the total, the local share must increase every year during the grant period and the Federal share must decrease.** This means that if you received \$60,000 from the Federal government for your COPS Universal Hiring Program officer, you could spend the Federal share at \$38,000 for year one, \$15,000 for year two, and \$7,000 for year three and meet the local share increase/Federal share decrease requirement. If you have any questions about adjusting your match differently than you stated in your budget, please contact your grant advisor or financial analyst.

### Should I maintain records of the match?

You should maintain records of your local share. These records should clearly show the source of the match, the amount of the match and when the match was contributed.

## WAIVERS

### Can the matching requirement be waived?

In order to maximize the number of communities that can take advantage of COPS grants, only a very small portion of waiver requests are granted at the time of application. **Waiver requests can only be considered when a jurisdiction makes the request at the time of application.** Applicants that are able to provide satisfactory documentation of severe fiscal distress may be granted waivers. Except in extreme situations, requests for waivers after an award to an agency has been made will not be considered.

### How are waivers granted?

It is the burden of the jurisdiction to demonstrate extreme fiscal distress at the time of application. Waivers fall under two categories: **presumptive** and **case-by-case**. If, at the time of application, the applicant is declared bankrupt by a court of law or placed in receivership by the state or Federal government, a presumptive waiver is granted. Case-by-case waivers are reviewed based on a demonstration of the following which must result in severe fiscal distress:

- Budgetary imbalance or expenditure cutbacks resulting in significant reductions in other services provided by the applicant;
- Significant lay-offs of personnel with the applicant department;
- Significant downgrading of applicant's bond rating due to fiscal stress;
- Location within an area in which a declaration of major disaster has been made pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act; and/or
- Other circumstances demonstrating severe fiscal distress.

### How are we notified about whether we received a waiver or not?

The cover letter and financial clearance memo in your grant award package will indicate whether your request for a waiver was granted. If you received a waiver and have additional questions, please contact your grant advisor.

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Waivers of the local match are granted only in cases of severe fiscal distress.

Please note that if you did receive a waiver, you are expected to develop and implement a plan for the continuation of the funded activity following the conclusion of the Federal assistance.

### **How do we appeal the denial of a waiver?**

If your waiver request was denied and you would like to appeal the decision, please make your appeal to:

**U.S. Department of Justice  
Office of Community Oriented Policing Services (COPS)  
Attn: Assistant Director for Grants Administration  
1100 Vermont Avenue, NW, 10th Floor  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code.)**

**U**nder your COPS Universal Hiring Program grant, you are required to establish and maintain accounting systems and financial records to accurately account for funds awarded and disbursed. These records need to include both Federal funds and all matching funds.

## ACCOUNTING SYSTEMS

You need to establish and maintain accounting systems and financial records to accurately account for funds awarded to you. These records should include both Federal funds and matching funds of state, local and private organizations.

Your accounting system should:

- Present and itemize approved costs of salaries and benefits and show the actual costs of salaries and benefits;
- Assure responsible use of grant funds;
- Assure that funds are spent in conformance with your grant conditions; and
- Be able to provide the necessary information for periodic review and audit.

### What records should be kept?

Your fiscal control and accounting systems should enable you to make accurate, current and complete disclosure of the financial activity under your COPS Universal Hiring Program grant. Your accounting records should contain information showing expenditures under the grant and must be supported by items such as payrolls, time and attendance records, canceled checks or similar documents.

You must adequately safeguard grant funds and make sure that they are used for authorized purposes. You will be responsible for refunding expenditures disallowed by auditors.

### How long should documents be kept?

All financial records, including payroll, time and attendance records, canceled checks and similar documents associated with your COPS Universal Hiring Program grant should be kept for at least three years from the grant closing audit report date. If any litigation, claim, negotiation, audit or other action involving these records has been started before the end of the 3-year period, the records should be kept until completion of the action. These records should be easily located and should be properly protected against fire or other damage.



You should maintain your records so that you can identify them by grant year or by your fiscal year, whichever you find more convenient.

### **What if we have more than one grant?**

If you have more than one Federal grant, funds received under one project may not be used to support another project. Your accounting systems and financial records must reflect expenditures for each project separately.

Federal funds may be used to meet your match only if they are specifically approved by the COPS Office. If Federal funds are being used to meet your match, your accounting system should accurately document how the funds are being used and the programmatic intent of the match funds.

### **Who may access our records?**

Authorized Federal representatives, including the representatives of the U.S. Department of Justice, the Comptroller General for the U.S., and the Monitoring Division of the COPS Office may access these records for the purposes of making audits, examinations, excerpts or transcripts.

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Records should be kept for at least three years from the grant closing audit report date.

## AUDITS

### Audit requirements<sup>1</sup>

State and local governments, nonprofit organizations, and institutions of higher education are governed by OMB Circular A-133, as amended. Whether an audit is required under this circular is dependent upon the amount of Federal funds that can be audited during the recipient's fiscal year. If the organization receives \$300,000 or more per year in Federal funds, the organization shall have an organizationwide financial and compliance audit.

State and local governments, nonprofit organizations and institutions of higher education receiving less than \$300,000 a year in Federal awards are exempt from Federal audit requirements, but records must be available for review by appropriate officials of the Federal grantor agency or subgranting entity.

Commercial (for profit) organizations shall have financial and compliance audits performed by qualified individuals who are independent from those who authorized the expenditure of Federal funds. This audit must be performed in accordance with Government Auditing Standards. The audit thresholds contained in OMB Circular A-133, as amended, apply.

### What is an organizationwide financial and compliance audit?

An organizationwide financial and compliance audit is an audit conducted by an independent auditor covering the entire operations of the state and local government, nonprofit organization, and institution of higher education. At the option of a particular government entity, an organizationwide financial and compliance audit can be performed only on the specific departments or agencies that will receive, expend or otherwise administer Federal funds during the fiscal year rather than on the entire state or government entity.

### What is the purpose of an audit?

Audits review your administration of grant funds, including your local match. Audits specifically determine whether:

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<sup>1</sup>Federal audit requirements recently were revised (July 1, 1996) effective for all organizations with a fiscal year beginning on or after July 1, 1996. Also, OMB Circular A-128 will be rescinded and OMB Circular A-133 will be revised to reflect this change. State and local governments previously under audit requirements under OMB Circular A-128 will be subject to audit requirements under revised OMB Circular A-133, as amended.

- You have established an accounting system which will provide reasonable assurance that your organization is managing the COPS Universal Hiring Program funds in compliance with the laws and regulations documented in this manual and in the assurances that were part of your application. Your accounting system must provide for adequate review and control by your authorized officials to provide accountability for grant draw down amounts, grant payments for salaries and benefits, matching fund payment and bank account balances.
- You or your financial manager have prepared financial statements that are accurate and that are in accordance with generally accepted accounting principles.
- You have prepared financial reports, including Financial Status Reports, cash reports, and claims for advances and reimbursements, which contain accurate and reliable financial data and are represented in accordance with the conditions of your COPS Universal Hiring Program grant and this COPS Universal Hiring Program Grant Owner's Manual.
- You have spent the grant funds in accordance with the conditions of your COPS Universal Hiring Program grant and provisions for Federal law that may bear on your financial statements.

## What are the audit reporting requirements?

If an auditor becomes aware of any issues or illegal acts, the auditor is required to give prompt notice of the problem to the management officials in your department. The management official is required to promptly notify your Cognizant Federal Agency of the issues or illegal acts and of the proposed and actual actions to solve the problem. The COPS Office must inform the appropriate officials, including state and local law enforcement agencies or prosecuting authorities, of any known violations of the law within their respective area of jurisdiction.

Your auditor may request from you the Catalog of Federal Domestic Assistance (CFDA) number for the Universal Hiring Program. That number is 16.710.

## What is the due date of audit reports?

1. A grantee whose fiscal year begins **before** July 1, 1998, must submit an audit report **within 13 months** after their fiscal year ends.
2. A grantee whose fiscal year begins **on** or **after** July 1, 1998, must submit an audit report **within 9 months** after their fiscal year ends.

## **Where are the audit reports to be submitted?**

Audit reports are to be submitted to your Cognizant Federal Agency and to other Federal agencies that provide direct Federal funding to your organization.

A Cognizant Federal Agency is generally the Federal agency that provides you the most Federal money. If this is the first Federal grant that your organization has received, the Department of Justice is your Cognizant Federal Agency. In that case, your audit reports should be sent to the Department of Justice Regional Inspector General's Offices. In addition, a copy of your audit transmittal letter (cover letter) addressed to the DOJ Regional Inspector General's Office must be sent to the Control Desk, Office of the Comptroller, Office of Justice Programs, 810 7th Street, NW, Washington, DC 20531. A list of the Department of Justice Regional Inspector General's Offices is provided in Appendix C.

If this is not your first Federal grant, please check with your financial analyst or auditor within your department to determine locally which is your Cognizant Federal Agency. If you are unable to determine which agency this is, please contact your COPS financial analyst.

## **What if there are problems with our audit report?**

Your management officials will need to develop recommendations for timely action that will resolve issues that the audit identifies. Prior to your audit, you should develop policies and procedures for how your agency will respond to audit recommendations. These policies and procedures should designate officials to be responsible for:

- Follow-up on audit findings.
- Maintaining a record of the actions taken on recommendations and time schedules.
- Responding to and acting on audit recommendations.
- Submitting periodic reports to the Cognizant Federal Agency on recommendations and actions taken.

## **How are audit requirements monitored?**

The Office of the Comptroller, in coordination with the COPS Office, will track audit requirements. Audit reports will be tracked until all issues are resolved and the audit is closed.

## **Where are the audit reports to be submitted?**

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## **How are audit requirements monitored?**

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## **How can our agency receive technical assistance with audit requirements?**

The Office of the Inspector General at the U.S. Department of Justice is available to provide technical assistance to you in implementing audit requirements where the U.S. Department of Justice is your assigned Cognizant Federal Agency. You may receive assistance on the following audit matters by contacting your Regional Inspector General (see Appendix C for addresses and telephone numbers):

- Review of audit arrangements.
- Review of audit programs or guides to be used for the conduct of the audit.
- On-site assistance in performing the audit, when necessary, as a result of complex problems that arise.

## **What are the consequences of not complying with audit requirements?**

Future grants cannot be awarded to any applicant who has an overdue audit report or an open audit report where the grantee has not attempted to respond or has taken no action to resolve findings. You must be in compliance with the audit requirements to receive grant funds. Exceptions to this policy are by the recommendation of the Office of the Comptroller.

Periodically, you will be asked to provide two types of reports: Program Progress Reports and Financial Status Reports. Funds and future awards may be withheld if reports are not returned or are excessively late.

## PROGRAM PROGRESS REPORTS

**There are three types of program Progress Reports:**

**The Department Initial Report** - This report is required only once during the life of the grant. It will be mailed soon after you receive your award packet and must be returned within 45 days of receipt.

**The Department Annual Report** - This report is required once a year during the life of the grant. It will be mailed in December of each year and must be completed and returned within 45 days.

**The Officer Progress Report** - This report is required once a year during the life of the grant. It will be mailed in December of each year and must be completed and returned within 45 days. Departments awarded 5-29 officers may be sent a disk version of the Officer Progress Report. Departments awarded 30+ officers will be sent the Aggregate Officer Progress Report.

**How often will Progress Reports be requested?**

The Department Annual Report and Officer Progress Report will be requested once a year. The Department Initial Report is requested only once during the life of the grant.

**What kind of information will these reports require?**

These reports will request information about the status of your grant in terms of selection, hiring and training; characteristics of the officers you have hired; descriptions of officer activities; and general information about your department. You also will be asked about progress you have achieved in implementing community policing.

## FINANCIAL STATUS REPORTS

### **How will grant funds be monitored?**

The Office of the Comptroller monitors the financial aspects of your grant through financial reports, meetings, telephone contacts, reports, audits, review of grant change requests and special request submissions. In specific cases, information may be requested during an on-site visit.

### **How do I file Financial Status Reports under PAPRS?**

Under the COPS PAPRS system, you are required to complete and return quarterly Financial Status Reports (SF-269) within 45 days after the end of the calendar quarter. The Financial Status Reports request information on your monies spent including amounts for Federal expenditures, local matching contributions and the unobligated balance of the award. Much of the standard information will be completed by the Office of the Comptroller for your review only. These Financial Status Reports will be mailed to you after the end of each calendar quarter.

**You will be unable to access funds in the PAPRS system if you have not submitted these Financial Status Reports.**

### **How do I file Financial Status Reports under LOCES?**

Under the LOCES payment method, you are required to complete and return quarterly Financial Status Reports (SF-269) within 45 days after the end of the calendar quarter. However, you have the option of completing those reports electronically each quarter.

## CASH RECONCILIATION REPORTS

The Office of Comptroller, Accounting Division, will send you on a semiannual basis a Cash Reconciliation report. This report includes all cash activity related to your grant award during the period. You will need to verify the accuracy of that report. No response is necessary if the information reflected in the report is in agreement with your accounting records. If the information differs from your accounting records, please notify the Accounting Division in writing outlining the identified differences.



## **HOW TO REPORT VIOLATIONS (Fraud, Waste and Abuse)**

If you suspect any alleged violations, serious irregularities or acts that may result in the use of public funds in a manner inconsistent with the Public Safety Partnership and Community Policing Act of 1994 or the purposes of this grant, please report such to the U.S. Department of Justice Inspector General Hotline at 1-800-869-4499. We would greatly appreciate your cooperation to help us ensure that these Federal grant funds are spent responsibly.

## **“CLOSING OUT” YOUR GRANT**

**A**t the end of your grant period, the COPS Office is responsible for the “close out” of your grant. To fulfill this requirement, we must determine that you, as well as the COPS Office, have completed all of the work required of the grant.

**Within 90 days of the end of the grant period, you will be asked to submit final financial and program reports. These reports will be very similar to the reports discussed in Section VI.**

### **Final Financial Status Report**

The final Financial Status Report of your grant award is due within 90 days after the end of the grant period. (Example: If the award period is 10/1/96 to 9/30/99, the final report is due by 12/31/99.) This final report should reflect the total amount of Federal expenditures, the total amount of matching contributions and the amount of unobligated funds, if any. Any unobligated or unspent funds will be deobligated from the award amount.

### **When should all of the grant monies be spent?**

Grant funds must be obligated by the end of the grant period. Obligated funds cover expenses that you have incurred but not yet paid. Grant funds that have been obligated will have 90 days after the end of the grant period in which to be expended. Any grant funds that you do not request payment for at the end of the 90 days will revert to the COPS Office.

### **Final Progress Report**

Within 90 days of the end of your grant award period, the COPS Office will ask you to submit a final Progress Report. The final Progress Report and its instructions will be mailed to you in the third year of your grant. It will request information similar to the annual Progress Reports.

## CONCLUSION

**W**e hope that this manual has assisted you with your grant questions. We welcome and encourage any comments you have regarding the COPS Universal Hiring Program and the materials we are developing for its administration. If you have specific comments regarding this manual, please send them to:

**COPS Universal Hiring Grant Owner's Manual**  
**1100 Vermont Ave., NW, 7th Floor**  
**Washington, DC 20530**  
*(For overnight delivery, please use 20005 as the zip code.)*

We will review these comments and make revisions as appropriate.

If you have any questions about your grant, please call your grant advisor at 1-800-421-6770.

## APPENDIX A

### List of Source Documents

#### ***Primary Sources:***

Public Safety Partnership and Community Policing Act of 1994, 42 U.S.C.

U.S. Department of Justice, Office of Justice Programs, Financial and Administrative Guide for Grants, OJP M 7100.1D: May 15, 1990

#### ***Additional Sources:***

Code of Federal Regulations (CFR)

28 CFR Part 66 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

28 CFR Part 67 Governmentwide Requirements for Drug-Free Workplaces (Grants)

28 CFR Part 69 Governmentwide New Restrictions on Lobbying

31 CFR Part 205 Treasury Department Regulations Implementing for Cash Management Improvement Act of 1990

OMB Circular A-87 *Cost Principles for State and Local Governments*

OMB Circular A-33 *Audits of Educational Institutions*

Assurances for Universal Hiring (Included)

Executive Order 12547 “Non-Procurement Debarments and Suspension”

Executive Order 12372, 28 CFR, Part 30 “Intergovernmental Review of Federal Programs”

OMB Circular A-129 *Managing Federal Credit Programs*

4 CFR Parts 101-105 Department of Justice/General Accounting Office, “Joint Federal Claims Collections Standards”

5 CFR Part 1320 “Controlling the Paperwork Burden on the Public”

Executive Order 12291 “Regulations”

5 CFR Part 151 “Political Activities of State and Local Officials or Employees”

## **APPENDIX B**

### **Assurances and Certifications**

## **APPENDIX B**

### **Assurances and Certifications**



## Assurances

Several provisions of Federal law and policy apply to all grant programs. We (the **Office of Community Oriented Policing Services**) need to secure your assurance that you (**the applicant**) will comply with these provisions. If you would like further information about any of the matters on which we seek your assurance, please contact us.

By your authorized representative's signature, you assure us and certify to us that you will comply with all legal and administrative requirements that govern the applicant for acceptance and use of Federal grant funds. In particular, you assure us that:

1. You have been legally and officially authorized by the appropriate governing body (for example, mayor or city council) to apply for this grant and that the persons signing the application and these assurances on your behalf are authorized to do so and to act on your behalf with respect to any issues that may arise during processing of this application.
2. You will comply with the provisions of Federal law which limit certain political activities of your employees whose principal employment is in connection with an activity financed in whole or in part with this grant. These restrictions are set forth in 5 U.S.C. § 1501, et seq.
3. You will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act, if they apply to you.
4. You will establish safeguards, if you have not done so already, to prohibit employees from using their positions for a purpose that is, or gives the appearance of being, motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business or other ties.
5. You will give the Department of Justice or the Comptroller General access to and the right to examine records and documents related to the grant.
6. You will comply with all requirements imposed by the Department of Justice as a condition or administrative requirement of the grant; with the program guidelines; with the requirements of OMB Circulars A-87 (governing cost calculations) and A-128 or A-133 (governing audits); with the applicable provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; with 28 CFR Part 66 (Uniform Administrative Requirements); with the provisions of the current edition of the appropriate COPS grant owner's manual; and with all other applicable laws, orders, regulations or circulars.
7. You will, to the extent practicable and consistent with applicable law, seek, recruit and hire qualified members of racial and ethnic minority groups and qualified women in order to further effective law enforcement by increasing their ranks within the sworn positions in your agency.
8. You will not, on the ground of race, color, religion, national origin, gender, disability or age, unlawfully exclude any person from participation in, deny the benefits of or employment to any person, or subject any person to discrimination in connection with any programs or activities funded in whole or in part with Federal funds. These civil rights requirements are found in the non-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended (42 U.S.C. § 3789(d)); Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000d); the Indian Civil Rights Act (25 U.S.C. §§ 1301-1303); Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794); Title II, Subtitle A of the Americans with Disabilities Act (ADA) (42 U.S.C. § 12101, et seq.); the Age Discrimination Act of 1975 (42 U.S.C. § 6101, et seq.); and Department of Justice Non-Discrimination Regulations contained in Title 28, Parts 35 and 42 (subparts C, D, E and G) of the Code of Federal Regulations.
- A. In the event that any court or administrative agency makes a finding of discrimination on grounds of race, color, religion, national origin, gender, disability or age against you after a due process hearing, you agree to forward a copy of the finding to the Office of Civil Rights, Office of Justice Programs, 810 7th Street, NW, Washington, DC 20531.
- B. If you are applying for a grant of \$500,000 or more and Department regulations (28 CFR 42.301 et seq.) require you to submit an Equal Opportunity Employment Plan, you will do so at the time of this application, if you have not done so in the past. If you are applying for a grant of less than \$500,000 and the regulations require you to maintain a Plan on file in your office, you will do so within 120 days of your grant award.
9. You will insure that the facilities under your ownership, lease or supervision which shall be utilized in the accomplishment of the project are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that you will notify us if you are advised by the EPA indicating that a facility to be used in this grant is under consideration for listing by EPA.
10. If your state has established a review and comment procedure under Executive Order 12372 and has selected this program for review, you have made this application available for review by the state Single Point of Contact.
11. You will devise a plan to retain the increased hiring level with state and local funds after the conclusion of your grant.

*I hereby certify compliance with the above assurances that govern the application and use of Federal funds.*

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



## Certifications

### Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements Coordination with Affected Agencies; Non-Supplanting; and Retention.

Although the Department of Justice has made every effort to simplify the application process, other provisions of Federal law require us to seek your certification regarding certain matters. Applicants should read the regulations cited below and the instructions for certification included in the regulations to understand the requirements and whether they apply to a particular applicant. Signature of this form provides for compliance with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying," and 28 CFR Part 67, "Government-wide Debarment and Suspension (Nonprocurement) and Government-wide Requirements for Drug-Free Workplace (Grants)," and the coordination and non-supplanting requirements of the Public Safety Partnership and Community Policing Act of 1994. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Justice determines to award the covered grant.

#### 1. Lobbying

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, the applicant certifies that:

- A. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment or modification of any Federal grant or cooperative agreement;
- B. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form — LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;
- C. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

#### 2. Debarment, Suspension and Other Responsibility Matters (Direct Recipient)

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67, for prospective participants in primary covered transactions, as defined at 28 CFR Part 67, Section 67.510 —

- A. The applicant certifies that it and its principals:
  - (i) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of

Federal benefits by a state or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency;

- (ii) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing public (Federal, state or local) transaction or contract under a public transaction; violation of Federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (iii) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, state or local) with commission of any of the offenses enumerated in paragraph (A)(ii) of this certification; and
- (iv) Have not within a three-year period preceding this application had one or more public transactions (Federal, state or local) terminated for cause or default; and

B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

#### 3. Drug-Free Workplace (Grantees Other Than Individuals)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, for grantees, as defined at 28 CFR Part 67, Sections 67.615 and 67.620 —

- A. The applicant certifies that it will, or will continue to, provide a drug-free workplace by:
  - (i) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
  - (ii) Establishing an on-going drug-free awareness program to inform employees about —



- (a) The dangers of drug abuse in the workplace;
- (b) The grantee's policy of maintaining a drug-free workplace;
- (c) Any available drug counseling, rehabilitation and employee assistance programs; and
- (d) The penalties that may be imposed upon employees for drug-abuse violations occurring in the workplace;
- (iii) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (i);
- (iv) Notifying the employee in the statement required by paragraph (i) that, as a condition of employment under the grant, the employee will —
- (a) Abide by the terms of the statement; and
- (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (v) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (iv)(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to: COPS Office, 1100 Vermont Ave., NW, Washington, DC 20530. Notice shall include the identification number(s) of each affected grant;
- (vi) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (iv)(b), with respect to any employee who is so convicted —
- (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state or local health, law enforcement or other appropriate agency;
- (vii) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (i), (ii), (iii), (iv), (v) and (vi).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of performance (street address, city, county, state, zip code)

Check ☒ if there are workplaces on file that are not identified here.

Section 67.630 of the regulations provides that a grantee that is a state may elect to make one certification in each Federal fiscal year, a copy of which should be included with each application for Department of Justice funding. States and state agencies may elect to use OJP Form 4061/7.

Check ☐ if the state has elected to complete OJP Form 4061/7.

#### 4. Coordination

The Public Safety Partnership and Community Policing Act of 1994 requires applicants to certify that there has been appropriate coordination with all agencies that may be affected by the applicant's grant proposal if approved. Affected agencies may include, among others, the Office of the United States Attorney, state or local prosecutors, or correctional agencies. The applicant certifies that there has been appropriate coordination with all affected agencies.

#### 5. Non-Supplanting

The applicant hereby certifies that Federal funds will not be used to replace or supplant state or local funds, or funds supplied by the Bureau of Indian Affairs, that would, in the absence of Federal aid, be made available to or for law enforcement purposes.

#### 6. Retention

The applicant hereby certifies that it understands that it must abide by its submitted plan to retain the additional officer positions at the conclusion of the grant period.

Grantee Name and Address: \_\_\_\_\_

Application No. and/or Project Name: \_\_\_\_\_ Grantee IRS/ Vendor Number: \_\_\_\_\_

Typed Name and Title of Law Enforcement Representative: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*As the duly authorized representative of the governing body, I hereby certify that the I am binding the governing body to the above certifications, including the plan to retain. Elections of new officials will not relieve the governing body of its obligations under this grant.*

Typed Name and Title of Government Representative: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## APPENDIX C

### Regional Offices of the Inspector General for Audit

Regional Audit Office	Geographical Area of Responsibility
Clark F. Cooper, Atlanta, Regional Inspector General for Audit 101 Marietta Street, Suite 2322 Atlanta, GA 30323-2401 Voice No. (404) 331-5037; Fax No. (404) 331-5046	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, Tennessee, South Carolina, Puerto Rico, Virgin Islands
Robert C. Gruensfelder, Chicago, Reg. Inspector General for Audit 500 West Madison, Suite 3510 Chicago, IL 60661-2550 Voice No. (312) 353-1203; Fax No. (312) 886-0513	Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, Ohio, Wisconsin
George W. Stendell, Dallas, Regional Inspector General for Audit 207 S. Houston St., Box 4, Room 575 Dallas, TX 75202-4724 Voice No. (214) 655-5000; Fax No. (214) 655-5025	Arkansas, Louisiana, New Mexico, Oklahoma, Texas
David Sheenen, Denver Area Assistant Regional Inspector General for Audit Colonnade Center Federal Building 1244 Speer Boulevard, Suite 640 Denver, CO 80204 Voice No. (303) 844-3638; Fax No. (303) 844 2780	Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming
M. Thomas Clark, San Francisco, Regional Inspector General for Audit 1200 Bayhill Drive, Suite 201 San Bruno, CA 94066 Voice No. (415) 876-9220; Fax No. (415) 876-0902	Alaska, Arizona, California, Hawaii, Idaho, Nevada, Oregon, Washington, American Samoa, Guam, Trust Territories of the Pacific Islands, Commonwealth of Northern Marianna Islands
Domenic A. Zazzaro, Northeast, Reg. Inspector General for Audit 1425 New York Avenue, NW, Suite 6001 Washington, DC 20530 Voice No. (202) 616-4688; Fax No. (202) 616-4581	District of Columbia, Maryland, Virginia, West Virginia
David Andelman, NE Area Assistant Regional Inspector General for Audit 701 Market Street, Suite 201 Philadelphia, PA 19106 Voice No. (215) 580-2111; Fax No. (215) 597-1348	Connecticut, Delaware, Maine, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont